

August 3, 2016

**VIA ECF**

Honorable Robert M. Levy  
United States District Court, Eastern District of New York  
225 Cadman Plaza East  
Brooklyn, New York 11201

Re: *Government Employees Ins. Co., et al. v. Jacobson, et al.*,  
Docket No.: 15-cv-7236 (ERK) (RML)

To Judge Levy:

As Your Honor is aware, the undersigned represents Dr. Jacobson, his corporations, BMJ Chiropractic, NJ Pain Treatment, NJ Neuro and Pain, Dr. Bruce Jacobson, DC PC, and Jacobson Chiropractic, as well as his employees and former employees, Drs. Beynin, Zambuto, Albis, Park, and Klass. Please accept this letter in response to Plaintiffs' motion to compel discovery (doc. 79) of my clients.

Geico, through its voluminous requests, of which the lion-share are irrelevant, unlikely to lead to admissible evidence and harassing, has caused defendants undue burden and created a circumstance in which extensive research is required in order to properly respond. Defendants have been diligently performing their research in order to provide thorough answers and requested an extension of time from Plaintiffs to provide same.

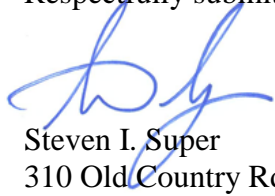
Defendants have requested from Plaintiffs an additional three (3) weeks to respond to the requests. Of that time, the first ten (10) days I am unavailable due to a previously planned family vacation which places me out of town and upon my return, I will be out of town on another matter, with plaintiffs' counsel. While my clients remain diligent in their research, the extension would only grant the undersigned a week to meet with my clients and finalize their responses. Plaintiffs' counsel, through a sheer lack of professional courtesy and what can only be described as seizing a billing opportunity, refused to extend defendants time to respond beyond my prior commitments and filed the within motion.

For the foregoing reasons, Defendants hereby request from the Court an extension of time to



respond to the discovery requests through the end of August.

Respectfully submitted,



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